

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PARAMOUNT PARKS INC.

Plaintiff,

v.

LESTER NAIL

Defendant.
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Case No. 07 CV 10595 (SHS)

**NOTICE OF MOTION FOR SUMMARY JUDGMENT
FILED BY PLAINTIFF PARAMOUNT PARKS INC.**

PLEASE TAKE NOTICE that, upon the declaration of Jill S. Kirila dated July 11, 2008 and the accompanying memorandum of law and statement of uncontested material facts, pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiff Paramount Parks Inc. ("PPI") hereby moves this Court for a summary judgment on Counts One (breach of contract), Two (breach of contract), and Three (unjust enrichment) of Plaintiff's Complaint and Counts One (breach of contract) and Two (conversion) of Defendant's Counterclaims against PPI and for such other and further relief as may be just and proper.

Dated: New York, New York
July 11, 2008

Respectfully submitted,

SQUIRE, SANDERS & DEMPSEY L.L.P.

By: /s/ Jill S. Kirila

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